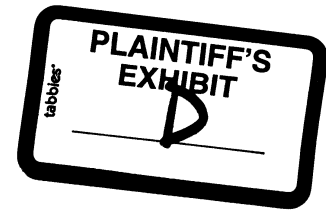


**FREKING & BETZ**  
**215 EAST NINTH STREET**  
**FIFTH FLOOR**  
**CINCINNATI, OHIO 45202**  
**(513) 721-1975**



CHERYL SOUTHERLAND  
 3646 PROVILLO ROAD  
 MORROW OH 45152

Page: 1  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

**STATEMENT FOR SERVICES**

Professional services

	Hours
01/11/00 MWN Review Intake Sheet	0.20
01/12/00 MWN Conference with Cheryl	1.00
01/14/00 MWN Draft letter to Bruce Armstrong	1.00
01/15/00 LC Draft letter to doctors regarding medical bills/records	0.50
01/18/00 MWN Review file	1.50
01/19/00 MWN Draft letter EEOC regarding: intake interview	0.50
MWN Draft letter Cheryl	0.50
01/27/00 MWN Review letter from B. Armstrong regarding documents	0.70
02/08/00 MWN Draft letter to EEOC enclosing documents received from Sycamore	0.20
02/09/00 MWN Conference at Montgomery Elementary with Bucholz and Phillips	3.00
02/10/00 MWN Telephone conference with Peggy Phillips, Sycamore Employee Development Center	0.30
02/17/00 MWN Review fax from P. Phillips	0.20
02/18/00 MWN Draft letter to P. Phillips, enclosing EEOC Affidavit	0.20
02/20/00 MWN Telephone conference with Cheryl; telephone conference with Phillips.	0.30
03/10/00 MWN Review letter EEOC regarding mediation dates and enclosures	0.30
MWN Draft letter to Cheryl regarding mediation	0.10
03/14/00 MWN Draft letter Cheryl regarding enclosures from EEOC regarding Mediation.	0.20
03/16/00 MWN Draft letter B. Armstrong regarding negotiation for documents	0.20

CHERYL SOUTHERLAND

Page: 2  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

## LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
04/03/00 MWN Review letter response from B. Armstrong.	0.10
04/05/00 MWN Draft letter B. Armstrong requesting records	0.10
04/14/00 LC Draft letter City of Mont EMS regarding run report of 1/31/00	0.10
LC Draft letter Bethesda North regarding request itemized bill and medical records from 1/1/00 to present	0.10
LC Draft letter Northeast Radiology regarding request for itemized bill for 1/31/00	0.10
LC Draft letter to Qualified Emergency Specialists regarding request for itemized bill for 1/31/00	0.10
LC Draft letter to Dr. Murthy regarding request for medical records from 2/6/00 to present and itemized bill	0.20
04/19/00 MWN Prepare for EEOC mediation	1.50
04/20/00 MWN Attend EEOC mediation; conference Cheryl	5.00
04/24/00 MWN Telephone conference with Cheryl	0.30
04/26/00 MWN Review fax from Cheryl	0.10
MWN Draft letter Cheryl regarding fax	0.40
MWN Draft letter Qualified Emergency Specialists egarding request for bill	0.10
05/04/00 LC Draft letter to Dr. Murthy regarding request for medical	0.10
05/13/00 MWN Drafting of Complaint; draft letter to Cheryl	1.50
05/23/00 MWN Fax to Feiertag, EEOC	0.20
06/01/00 MWN Telephone conference with Feiertag, EEOC	0.20
06/09/00 LC Draft letter 2nd Request Bethesda North regarding certified copies of records 1/1/00 to present	0.10
MWN Draft letter to Feiertag enclosing documents received from Syamore	0.10
06/19/00 MWN Conference at EEOC with Feiertag and Cheryl	2.70
06/22/00 MWN Review letter from Feiertag	0.30
06/27/00 MWN Review file regarding request from EEOC	0.40
06/28/00 MWN Draft letter EEOC regarding same	0.20
08/07/00 MWN Finalize Complaint and file	0.80
08/10/00 LC Draft letter Smart Corp. regarding medical records Bethesda North	0.10
MWN Draft letter Feiertag enclosing copy of complaint	0.10
MWN Draft letter to Cheryl enclosing copy of filed Complaint	0.10

CHERYL SOUTHERLAND

Page: 3  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
08/16/00 MWN Review notice from Court	0.10
09/01/00 MWN Review pleading - Winter	0.20
09/08/00 MWN Telephone conference with Gary Winters	0.10
10/12/00 LC Fax to Dr. Murthy regarding request for itemized bills and records 3/22 to present	0.10
11/01/00 MWN Review Interrogatories and Request for Production	0.40
11/05/00 MWN Review file	0.70
11/12/00 MWN Review file; prepare answers	0.80
01/05/01 MWN Review file; prepare answers; Draft letter Cheryl	1.10
01/08/01 MWN Finalize Answers	0.80
01/10/01 MWN Draft letter Winters regarding Answers to Interrogatories and responses to Request for Production of Documents	0.40
MWN Review Notice from Court	0.10
01/15/01 LC Draft letter to EEOC regarding NORTS	0.10
01/22/01 LC Draft letter Dr. Murthy regarding request for medical records and item. bill	0.20
02/01/01 MWN Review file; begin draft of settlement demand	0.90
02/05/01 MWN Continue draft of settlement demand	1.00
02/09/01 MWN Finalize demand; draft letter Winters regarding same	0.60
02/20/01 MWN Draft letter Winters enclosing medical records and bill for Dr. Murthy and bill from Mercy Medical Association and updated special listing	0.20
03/13/01 MWN Draft letter Cheryl regarding status of case and motion for deposition	0.50
03/15/01 MWN Draft letter Dr. Murthy regarding request for narrative report	0.30
03/19/01 MWN Draft letter Cheryl regarding trial date	0.20
03/22/01 MWN Drafting of Amended Complaint and stipulation of leave	0.70
03/29/01 MWN Prepare for deposition; attend deposition of Cheryl.	5.70
04/02/01 MWN Draft letter Winters regarding Amended Complaint and Stipulation	0.20

CHERYL SOUTHERLAND

Page: 4  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
04/06/01 MWN Draft letter Winters	0.10
04/07/01 MWN Telephone conference with Winters regarding Stipulation	0.10
04/08/01 MWN Review narrative report from Dr. Murthy	0.40
04/11/01 MWN Draft letter Cheryl	0.10
MWN Draft letter Winters	0.10
04/17/01 MWN Review Answer to Amended Complaint	0.20
04/27/01 MWN Draft letter to Dr. Murthy	0.10
05/07/01 MWN Review letter from court reporter regarding Cheryl's transcript	0.10
05/08/01 MWN Draft letter to Cheryl regarding transcript	0.10
05/18/01 MWN Review EEOC determination	0.20
06/29/01 MWN Draft Notice of Deposition; draft letter to Winters regarding same	0.80
07/20/01 MWN Draft letter to Cheryl regarding EEOC conciliation	0.10
07/23/01 MWN Review file; Draft letter EEOC regarding summary	0.90
07/24/01 MWN Finalize summary and draft letter to Feiertag regarding same	0.40
07/26/01 MWN Review fax from Feiertag and conciliation agreement	0.30
07/27/01 MWN Conference with Cheryl; attend conciliation meeting at EEOC	2.50
08/17/01 MWN Review letter from EEOC; ref case to DOJ	0.10
08/19/01 MWN Telephone conference with Winters regarding depositions	0.30
08/21/01 MWN Review letter Winter confirming deposition	0.10
08/22/01 MWN Draft letter Cheryl regarding deposition dates	0.10
09/03/01 MWN Review file materials; prepare exhibits; prepare for depositions	6.00
09/04/01 MWN Attend depositions of Peggy Phillips and John Buchholz	4.00
09/05/01 MWN Attend depositions of John Buchholz (continued) and Janet Schultz	4.00
09/10/01 MWN Draft letter to Ace Reporting	0.10

CHERYL SOUTHERLAND

Page: 5  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
09/20/01 MWN Draft letter to Cheryl	0.10
09/21/01 MWN Draft letter to Cheryl	0.10
09/24/01 MWN Draft letter to Ace	0.10
10/02/01 MWN Review file	0.20
10/12/01 MWN Prepare Notice of Change of firm	0.20
MWN Letter to attorney Gary Winters.	0.10
MWN Memo regarding request for NORTS.	0.20
10/16/01 MWN Review letter - Winter regarding Motion for Summary Judgment; review MSJ	0.70
10/24/01 MWN Telephone conference with Cheryl.	0.30
10/25/01 MWN Prepare Entry of Dismissal	0.10
10/26/01 MWN Draft letter to Winters regarding notice of dismissal	0.10
10/30/01 MWN Review Notice from Court	0.10
10/31/01 MWN Telephone conference with Margie Ging, EEOC.	0.20
11/01/01 MWN Letter to Cheryl.	0.20
MWN Prepare verification of representation form.	0.20
11/20/01 MWN Letter to EEOC.	0.30
12/05/01 MWN Review message from Tom Feiertag at EEOC.	0.10
01/02/02 MWN Legal research.	0.20
01/07/02 MWN Telephone call to Cindy Piccoro regarding status of NORTS (left message).	0.10
01/08/02 CAP Review message from Mark Napier.	0.10
01/15/02 CAP Telephone conference with L. Watson at EEOC; fax NORTS request to L. Watson; conference with Mark Napier.	0.40
MWN Conference with Cindy Piccoro.	0.10
01/30/02 MWN Review correspondence from U.S.D.O.J.	0.10
01/31/02 MWN Review correspondence to EEOC.	0.10
CAP Receive NORTS; draft letter to EEOC requesting file.	0.40
02/21/02 MWN Review FOIA materials from EEOC.	0.70
02/25/02 MWN Telephone conference with Cheryl.	0.20
03/05/02 RHF Conference with Mark Napier	0.50
MWN Conference with Randy Freking	0.50

CHERYL SOUTHERLAND

Page: 6  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

## LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
03/06/02 MWN Draft Complaint.	1.80
03/07/02 MWN Draft Complaint.	1.80
RHF Review Complaint; conference with Mark Napier	0.50
MWN Conference with Randy Freking	0.20
03/08/02 MWN Draft Complaint.	1.40
MWN Draft correspondence to counsel.	0.20
03/13/02 KJH Prepare Waiver; letter to Cheryl.	0.30
03/14/02 AKC Conference with Kathi Huber; review Complaint.	0.20
KJH Conference with Suzanne Mehl.	0.10
03/18/02 AKC Telephone conference with Cheryl.	0.10
AC Update pleading board.	0.10
03/20/02 MWN Review correspondence from Beth Weber.	0.10
03/28/02 AC Update pleading board.	0.10
04/05/02 JT Review file and documents; draft witness list.	1.70
AKC Conference with Jennifer Trakas.	0.10
JT Conference with Suzanne Mehl.	0.10
04/08/02 AKC Conference with Jennifer Trakas.	0.10
JT Conference with Suzanne Mehl.	0.10
04/09/02 JT Organize documents.	3.80
04/27/02 AKC Review file.	0.20
05/08/02 MWN Telephone conference with Cheryl.	0.10
05/17/02 KJH Answer Comparison.	0.40
05/20/02 MWN Review Answer Comparison.	0.20
MWN Update CSR.	0.10
05/21/02 MWN Review Notice of Preliminary Pre-trial Conference.	0.10
05/22/02 AC Update pleading board.	0.10
05/23/02 AC Update pleading board.	0.10
06/21/02 KJH Draft Rule 26 disclosure.	0.20
07/01/02 MWN Review voice mail from Cheryl.	0.10
MWN Telephone conference with Cheryl.	0.20
07/03/02 MWN Telephone conference with G. Winters, Esq..	0.20
07/10/02 AC Update pleading board.	0.10

CHERYL SOUTHERLAND

Page: 7  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
07/22/02 MWN Review file; update CSR.	0.70
07/23/02 MWN Review voice mail from J. Spiegel's office; telephone call to Cheryl (left message).	0.20
07/24/02 MWN Conference with Cheryl; review Notice regarding Preliminary Pre-Trial.	0.20
07/29/02 AC Update pleading board.	0.10
08/01/02 MWN Review correspondence from G. Winters, Esq.	0.10
08/13/02 MWN Telephone conference with Sharon at G. Winters, Esq.	0.10
MWN Telephone call to Cheryl (left message).	0.10
08/19/02 AKC Review file; draft memo to Mark Napier.	0.10
MWN Review voice mail from Cheryl.	0.10
MWN Review memo - Suzanne Mehl.	0.10
08/21/02 MWN Telephone conference with Gary Winter's office; telephone call to Cheryl (left message); review file; draft memo to Kathi Huber.	0.60
MWN Telephone conference with Cheryl.	0.10
KJH Review memo - Mark Napier.	0.10
08/23/02 KJH Telephone conference with Cindy Oliver; telephone conference with Ace Reporting; voice mail to Mark Napier.	0.20
08/24/02 MWN Review voice mail - Kathi Huber.	0.10
08/28/02 KJH Conference with Mark Napier; telephone conference with Ace Reporting.	0.10
MWN Conference with Kathi Huber.	0.10
08/29/02 MWN Conference with Randy Freking	0.10
RHF Conference with Mark Napier	0.10
08/30/02 MWN Prepare for deposition of Cheryl; attend deposition of Cheryl.	1.00
09/13/02 MWN Review letter from Ace	0.10
09/16/02 MWN Review voice mail from Cheryl.	0.10
09/18/02 NAS Voice Mail to Mark Napier.	0.10
09/19/02 MWN Review voice mail from Nicole Seeling.	0.10
09/24/02 MWN Telephone call to G. Winters (left message).	0.10
NAS Conference with Mark Napier.	0.10
MWN Telephone call to G. Winters (left message).	0.10
KJH Draft e-mail to Winter	0.10
MWN Conference with Nicole Seeling.	0.10

CHERYL SOUTHERLAND

Page: 8  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
09/30/02 NAS Review file; draft Rule 26 disclosures.	3.00
10/01/02 NAS Conference with Mark Napier; draft letter to Dr. Murthy; telephone conference with Mercy Medical Associates; draft letter to Cheryl; prepare medical authorizations; organize documents.	0.50
MWN Conference with Nicole Seeling.	0.10
10/02/02 MWN Conference with Heather Hersh.	0.10
MWN Review voice mail from G. Winters.	0.10
10/07/02 NAS Amend Rule 26 disclosures; draft letter to Mercy Medical, Meijer Pharmacy, and Dr. Murthy.	0.50
10/08/02 NAS Conference with Mark Napier.	0.10
MWN Review voice mail from Cheryl.	0.10
MWN Review documents begin produced; conference with Nicole Seeling.	0.40
10/09/02 NAS Draft letter to G. Winters.	0.10
10/10/02 MWN Telephone call to G. Winters, Esq.	0.10
10/14/02 MWN Telephone call to Cheryl (left message).	0.10 no charge
10/16/02 MWN Telephone conference with J. Spiegel's office; telephone call to Cheryl (left message).	0.10
AC Update pleading board.	0.10
10/17/02 MWN Telephone conference with Cheryl; draft memo.	0.30
10/19/02 MWN Review Notice from Court	0.10
10/21/02 MWN Draft memo to law clerk.	0.20
MWN Telephone conference with Dr. Marte.	0.20
LC Review Memo - Mark Napier.	0.10
10/22/02 NAS Telephone conference with Dr. David Seltzer; draft memo to Mark Napier.	0.20
MWN Review memo from Nicole Seeling.	0.10
MWN Review Notice from Court.	0.10
10/24/02 NAS Review letter Meijer	0.10
10/25/02 AC Update pleading board.	0.10
10/28/02 AC Update pleading board.	0.10
10/29/02 NAS Draft letter G. Winters; send reminder to Mercy Medical.	0.20
MWN Review medical report from Dr. Murthy; e-mail to Dr. Lewis.	0.40
MWN Draft Memo to Nicole Seeling.	0.10



CHERYL SOUTHERLAND

Page: 9  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
10/30/02 NAS Telephone conference with Dr. Murthy; draft letter to G. Winters.	0.20
11/01/02 MWN Review voice mail from Cheryl; telephone conference with Cheryl.	0.10
11/04/02 MEC Conference with Mark.	0.10
MWN Conference with Megan Clark.	0.10
11/05/02 MEC Attend preliminary pre-trial conference.	0.60
MWN Review file; preparation of case plan.	1.20
MEC Draft memo Mark Napier.	0.20
11/06/02 NAS Telephone conference with Mercy Medical.	0.10
NAS Review file; draft memo to Jennifer Trakas.	0.20
JT Review file.	0.80
MWN Review memo from Megan Clark.	0.10
NAS Draft Fax to Mercy Medical	0.10
11/07/02 JT Review memo Nicole Seeling.	0.10
11/11/02 JT Conference with Mark Napier regarding discovery requests; draft request for discovery requests.	0.50
MWN Conference with Jennifer Trakas.	0.10
11/12/02 JT Telephone conference with Mark Napier regarding discovery requests.	0.10
MWN Review Preliminary Pre-trial Order	0.10
MWN Telephone conference with Jennifer Trakas.	0.10
11/13/02 JT Telephone conference with Mark Napier regarding discovery requests.	0.10
MWN Telephone conference with Jennifer Trakas.	
11/14/02 AC Update pleading board.	0.10
JT Review file.	1.90
JT Review draft discovery.	0.20
11/18/02 AC Update pleading board.	0.10
JT Review documents from basement file.	3.00
11/22/02 NAS Review file; telephone conference with Mercy Medical.	0.20
NAS Review file; telephone conference with health care providers.	0.20
11/26/02 MWN Draft discovery requests.	0.70
11/27/02 JT Conference with Mark Napier regarding requests for document production.	0.10
MWN Conference with Jennifer Trakas.	0.10
11/29/02 MWN Draft discovery requests and correspondence to G. Winters; review A. Voluse file.	3.00

CHERYL SOUTHERLAND

Page: 10  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

## LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
12/02/02 NAS Review medical records; draft letter to G. Winters; conference with Mark Napier.	0.50
AC Update discovery notebook.	0.10
LC Prepare document production.	0.40
MWN Conference with Nicole Seeling.	0.10
12/09/02 JT Conference with Mark Napier regarding scheduling depositions.	0.10
MWN Conference with Jennifer Trakas.	0.10
12/10/02 AKC Review documents; conference with Jennifer Trakas regarding Defendant's Rule 26 disclosures.	1.30
JT Conference with Suzanne Mehl.	0.10
12/12/02 JT Draft memo to Mark Napier regarding status.	0.20
12/13/02 MWN Conference with Jennifer Trakas.	0.10
JT Conference with Mark Napier.	0.10
12/14/02 MWN Review memo from Jennifer Trakas; reply to same.	0.20
12/15/02 JT Review memo Mark Napier.	0.10
12/17/02 KJH Prepare deposition notice.	0.10
JT Schedule Szakovitz deposition; draft memo to to Kathi Huber regarding same.	0.30
MWN Draft letter to Winters regarding deposition	0.10
KJH Review memo Jennifer Trakas.	0.10
12/20/02 AC Update pleading board.	0.10
12/23/02 LC Prepare deposition abstract.	1.30
12/24/02 LC Prepare deposition abstract.	2.60
01/02/03 MWN Draft memo to Kathi Huber.	0.10
MWN Review deposition abstract of J. Schultz; draft 2nd discovery requests.	0.40
MWN Telephone conference with G. Winters; draft letter G. Winters.	0.30
KJH Conference with Mark Napier; conference with Ron Seibel; telephone conference with Ace Reporting.	0.30
LC Prepare deposition abstract.	2.20
LC Conference with Kathi Huber.	0.10
MWN Conference with Kathi Huber.	0.10
01/06/03 MWN Telephone conference with I. Smith.	0.10
01/08/03 AC Update discovery notebook.	0.10
01/14/03 MWN Review Cheryl's deposition abstract.	0.20
MWN Voice Mail from Ian Smith.	0.10

CHERYL SOUTHERLAND

Page: 11  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
01/15/03 MWN Draft letter to Cheryl	0.10
01/28/03 KJH Telephone conference with Ace Reporting; conference with Ron Seibel.	0.10
LC Conference with Kathi Huber.	0.10
01/30/03 MWN Telephone call to Ian Smith (left message).	0.10
01/31/03 JT Conference with Mark Napier regarding expert; conference with Clint Collins regarding same; draft Designation of Expert Witnesses; draft memo to Mark Napier regarding same.	0.60
JT Telephone conference with Cheryl regarding changed deposition.	0.10
JT Conference with Mark Napier regarding experts; research expert witness information.	0.50
KJH Telephone conference with Annette Schoch; preparation of deposition notice and letter to G. Winters.	0.20
MWN Review voice mails from I. Smith; review amended notice; review correspondence to G. Winters.	0.30
MWN Telephone conference with I. Smith; voice mail to Kathi Huber; voice mail to Jennifer Trakas.	0.30
MWN Conference with Jennifer Trakas (2x)	0.20
CRC Conference with Jennifer Trakas	0.10
02/01/03 KJH Review Voice mail from Mark Napier.	0.10
JT Review Voice mail from Mark Napier.	0.10
02/03/03 AC Update pleading board.	0.10
02/04/03 MWN Voice Mail from I. Smith; voice mail to Kathi Huber.	0.20
KJH Telephone conference with I. Smith; telephone conference with Annette Schoch.	0.10
MWN Review letter from Ace	0.10
KJH Review voice mail from Mark Napier.	0.10
02/07/03 JT Review documents from Defendant.	1.70
02/10/03 MWN Review Defendant's responses to Plaintiff's 1st set of discovery requests; review Defendant's documents and preparation for Szakovits deposition; attend deposition of Szakovits.	5.30
JT Conference with Mark Napier regarding documents.	0.10
AC Organize documents by Defendant.	0.50
AC Update discovery notebook.	0.10
AC Update discovery notebook.	0.10
MWN Conference with Jennifer Trakas.	0.10
02/14/03 JT Review status of 2nd Document Request.	0.10
02/19/03 MWN Review file; memo to Jennifer Trakas.	0.70
JT Search deposition records; draft letter to Meijer regarding same; draft letter to Dr. Murthy regarding same; preparation of authorizations.	1.90

CHERYL SOUTHERLAND

Page: 12  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

		Hours
	JT Review memo from Mark Napier.	0.10
02/20/03	JT Conference with Annette Schoch regarding deposition transcript.	0.10
	JT Review deposition files; conference with Kathi Huber regarding deposition transcripts; telephone conference with Cheryl regarding contacting witnesses.	1.40
	KJH Conference with Jennifer Trakas.	0.10
02/21/03	JT Draft memo to Mark Napier regarding 2/19 memo.	0.20
	JT Telephone conference with Cheryl regarding interviews.	0.10
	JT Telephone conference with Cheryl regarding Janet Potter; telephone conference with Cheryl regarding Fran Moody; conference with Mark Napier regarding interviews.	0.30
	JT Telephone conference with Cheryl regarding Janet Waldleitner.	0.10
	MWN Conference with Jennifer Trakas.	0.10
02/22/03	MWN Review memo Jennifer Trakas.	0.10
02/25/03	MWN Telephone call to F. Moody (left message); telephone call to J. Potter (left message); telephone conference with J. Potter; draft Affidavit; draft correspondence to J. Potter.	1.10
	KJH Draft letter to Cheryl	0.10
02/26/03	MWN Review voice mail from F. Moody.	0.10
	JT Telephone conference with Defendant's counsel; regarding court reporter; telephone conference with Williams and Oliver regarding deposition transcript; telephone conference with Cheryl regarding Janet Waldeitner (left message).	0.30
02/27/03	MWN Revise draft Affidavit of J. Potter.	0.30
	RHF Review letter Williams and Oliver	0.10
02/28/03	JT Prepare payment request for Meijer bill.	0.10
	JT Review Meijer bill.	0.10
03/01/03	MWN Review letter - Annette Schoch.	0.10
03/03/03	MWN Voice Mail to Jennifer Trakas.	0.10
	JT Review Voice mail Mark Napier.	0.10
03/04/03	KJH Conference with Mark Napier regarding depositions.	0.10
	KJH Prepare subpoena and deposition notices; letter to witness and opposing counsel; net search mapquest; telephone conference with LSS.	0.50
	MWN Conference with Kathi Huber.	0.10
03/05/03	AC Update pleading board.	0.10
	JT Draft letter to Kode Murthy regarding records.	0.10

CHERYL SOUTHERLAND

Page: 13  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

## LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
03/06/03 JT Telephone conference with Dr. Murthy's office regarding records; telephone call to Cheryl (left message).	0.20
JT Telephone conference with Cheryl regarding medical records.	0.10
03/07/03 RES Prepare deposition abstract.	2.20
03/10/03 JT Conference with Kathi Huber regarding Smith deposition; telephone conference with opposing counsel regarding same; conference with Mark Napier regarding same.	0.50
RES Prepare deposition abstract.	2.60
KJH Conference with Jennifer Trakas.	0.10
MWN Conference with Jennifer Trakas.	0.10
03/12/03 KJH Letter to Williams & Oliver.	0.10
KJH Telephone conference with Kirk @ Litigation Support.	0.10
03/13/03 KJH Telephone conference with Annette Schoch; conference with Jennifer Trakas and Mark Napier; net search - Mapquest.	0.20
MWN Review Szakovits deposition abstract.	0.20
MWN Voice Mail from I. Smith; voice mail to I. Smith.	0.10
MWN Voice Mail to Jennifer Trakas.	0.10
JT Conference with Kathi Huber.	0.10
MWN Conference with Kathi Huber.	0.10
03/14/03 KJH Prepare subpoena; preparation of deposition notices; letter to witness and opposing counsel; net search mapquest; draft memo to Beth Schirmer.	0.50
KJH Telephone conference with Kirk @ Litigation Support.	0.10
RES Organize documents.	0.20
JT Review Voice mail Mark Napier.	0.10
03/17/03 JT Conference with Kathi Huber regarding deposition.	0.10
JT Telephone conference with R. Smith regarding deposition; telephone call to Cheryl regarding same (left message).	0.20
JT Telephone conference with Cheryl regarding Smith deposition; conference with Mark Napier and Kathi Huber regarding same; telephone conference with Madeira Transportation.	0.50
KJH Conference with Jennifer Trakas (2x)	0.20
MWN Conference with Jennifer Trakas.	0.10
03/18/03 KJH Prepare Amended deposition notice; letter to G. Winters; letter to witness.	0.30
MWN Review Amended Notice of Deposition; review correspondence to G. Winters; voice mail to Jennifer Trakas.	0.20
JT Review Voice mail Mark Napier.	0.10
03/20/03 MWN Prepare for Smith deposition; review documents.	3.00
MWN Draft e-mail to Kathi	0.10
KJH Review e-mail from Mark	0.10

CHERYL SOUTHERLAND

Page: 14  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
03/21/03 MWN Telephone conference with Cheryl.	0.10
MWN Attend deposition of R. Smith.	2.40
03/25/03 KJH Telephone conference with court reporter; conference with Mark Napier; review file for deposition notes.	0.30
MWN Review letter AMS	0.10
MWN Conference with Kathi Huber.	0.10
03/28/03 MWN Review draft Potter Affidavit; revise Affidavit; draft correspondence to J. Potter.	0.20
04/01/03 MWN Review Motion for Summary Judgment.	0.40
MWN Review Notice of Filing deposition transcripts	0.20
04/04/03 RES Research.	0.30
RES Research.	0.20
KJH Conference with Ron Seibel; review depositions.	0.20
LC Conference with Kathi Huber.	0.10
04/09/03 KJH Review letter from Ace	0.10
04/15/03 RES Draft Motion for Extension; preparation of Memorandum in Opposition to Motion for Summary Judgment.	2.20
04/21/03 RES Prepare deposition abstract.	0.80
04/22/03 MWN Review Affidavit returned by J. Potter; note to Ron Seibel.	0.10
LC Review note Mark Napier.	0.10
04/28/03 RES Prepare Memorandum in Opposition to Motion for Summary Judgment.	7.40
04/29/03 RES Prepare Memorandum in Opposition to Motion for Summary Judgment.	6.80
04/30/03 MWN Review draft partial Memorandum in Opposition; research; draft Memorandum in Opposition.	2.50
MWN Review draft partial Memorandum in Opposition; revise; research.	0.70
RES Prepare Memorandum in Opposition to Motion for Summary Judgment.	9.30
05/01/03 RES Prepare Memorandum in Opposition to Motion for Summary Judgment.	7.00
MWN Revise draft Memorandum in Opposition; research.	5.00
KJH Conference with Ron Seibel regarding filing depositions.	0.10
KJH Conference with Mark Napier; organize depositions for filing; preparation of notice of filing.	0.30
LC Conference with Kathi Huber.	0.10
MWN Conference with Kathi Huber.	0.10
05/15/03 MWN Review Defendant reply memo.	0.30

CHERYL SOUTHERLAND

Page: 15  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
06/02/03 MWN Review notice from court	0.10
06/04/03 MWN Draft e-mail to Jennifer Trakas.	0.20
06/05/03 JT Review e-mail Mark Napier.	0.10
06/13/03 JT Draft letter to Cheryl regarding status.	0.10
06/20/03 JT Telephone conference with G. Winters regarding Pre-Trial Conference.	0.20
06/21/03 MWN Voice Mail from G. Winters.	0.10
06/23/03 JT Telephone call to Winter (left message) regarding pre-trial preparation; draft memo to Mark Napier regarding Pre-Trial Conference; draft memo to Jenna White.	0.30
MWN Review Memo Jennifer Trakas.	0.10
07/01/03 MWN Review Notice from Court; note to Jennifer Trakas.	0.10
RHF Review notice from Court	0.10
07/02/03 JT Telephone call to Cheryl regarding pre-trial (left message).	0.10
JT Review note - Mark Napier	0.10
07/06/03 MWN Draft e-mail to Jennifer Trakas.	0.20
07/07/03 JT Review e-mail - Mark Napier	0.10
07/08/03 MWN Finalize Rule 26 and file	0.50
07/10/03 RHF Conference with Mark Napier.	0.50
MWN Review Amended Rule 26 and file	0.30
MWN Conference with Randy Freking.	0.50
07/11/03 MWN Review Order.	0.50
JT Draft Joint Final Pre-Trial order; draft memo to to Mark Napier regarding same.	4.70
JT Conference with Mark Napier regarding pre-trial statement; revise.	2.40
07/13/03 RHF Review file; review Motion for Summary Judgment decision.	1.50
MWN Conference with Jennifer Trakas; Review Memo Jennifer Trakas	0.20
07/14/03 MWN Review draft Joint Final Pre-Trial order; review draft witness list; e-mail to Jennifer Trakas.	0.80
07/16/03 JT Conference with Mark Napier regarding pre-trial statement.	0.10
JT Telephone conference with Cheryl regarding pre-trial conference.	0.10
JT Conference with Mark Napier regarding pre-trial; revise	



CHERYL SOUTHERLAND

Page: 16  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

		Hours
	Pre-Trial order; telephone conference with Sharon @ Winter's office.	3.90
	MWN Conference with Jennifer Trakas (2x)	0.30
07/17/03	MWN Draft joint pre-trial order, exhibit list, witness list; review documents.	3.50
	JT Revise pre-trial order.	2.20
	JT Conference with Mark Napier regarding Pre-Trial order; gather documents for Mark Napier review.	0.20
	JT Conference with Mark Napier regarding Dr. Murthy; telephone conference with Dr. Murthy's office regarding deposition; conference with Mark Napier regarding Pre-Trial order; revise Pre-Trial order.	1.10
	JT Telephone conference with Winter's office; prepare and fax Pre-Trial order; conference with Mark Napier; revise Pre-Trial order.	1.70
	JT Review e-mail Winters office with final pre-trial	0.10
	MWN Conference with Jennifer Trakas (3x)	0.50
07/18/03	MWN Review and revise draft Joint Final Pre-Trial order.	1.50
	MWN Conference with Jenna White.	0.20
	JT Revise Pre-Trial order; conference with Mark Napier; prepare and send fax to Winters.	3.10
	JT Draft letter to Meijer regarding records; draft letter to Murthy regarding records; draft letter to Dault regarding records; preparation of medical authorizations.	0.50
	MWN Conference with Jennifer Trakas.	0.10
07/20/03	AC Telephone conference with Lisa Newman; draft e-mail to Lisa Newman	0.20
07/21/03	JT Conference with Beth Schirmer regarding costs and fees; telephone conference with Murthy office regarding deposition; review file for documents for pre-trial; draft memo to Mark Napier.	0.80
	JT Telephone call to Cheryl regarding reminder (left message).	0.10
	RHF Conference with Mark Napier	0.10
	MWN Conference with Randy Freking	0.10
07/22/03	MWN Prepare for Final Pre-Trial Conference; conference with Cheryl; Final Pre-Trial Conference; review deposition notice and correspondence to G. Winters.	3.60
	JT Telephone conference with health care providers regarding bills; preparation of medical authorizations; fax medical authorizations; conference with Mark Napier regarding pre-trial; conference with Murthy's office regarding deposition; draft records/expenses form; calculate damages; conference with Kathi Huber regarding deposition; locate Pleadings; copy documents for pre-trial.	3.30
	MWN Review memo Jennifer Trakas.	0.10
	MWN Conference with Jennifer Trakas.	0.10
	KJH Conference with Jennifer Trakas.	0.10



CHERYL SOUTHERLAND

Page: 17  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
07/23/03 MWN Telephone conference with Cheryl; draft correspondence to opposing counsel.	0.40
JT Prepare deposition book.	2.10
KJH Prepare Amended Notice; letter to G. Winters; telephone conference with Annette Schoch.	0.30
07/24/03 MWN Prepare for Murthy deposition; preparation of exhibits; review documents; conference with Cheryl; draft correspondence to opposing counsel; preparation of exhibits regarding Mercy Medical Associates, review voice mail from B. Wharton.	6.00
MWN Prepare for Murthy deposition.	1.50
JT Prepare exhibits and new documents; telephone conference with Murthy's office regarding bill.	1.40
MWN Review notice from Court	0.20
07/25/03 MWN Attend deposition of Dr. Murthy; travel to/from deposition.	2.20
JT Conference with Mark Napier regarding depositions.	0.20
MWN Conference with Jennifer Trakas.	0.10
07/26/03 MWN Draft e-mail to Jennifer Trakas regarding trial preparation needed; trial preparation.	2.20
07/28/03 LC Prepare jury instructions; review Memorandum in Opposition.	5.10
MWN Review Notice from Court	0.10
07/29/03 MWN Conference with Alicia Cole; conference with law clerk; preparation of voir dire questions; preparation for trial; telephone conference with Linda @ Court.	4.00
MWN Conference with Jenna White regarding juror questionnaires.	0.10
LC Prepare jury instructions; conferences with Mark Napier.	8.00
AKC Conference with Mark Napier, Kelly Mulloy Myers, and Kathi Huber; preparation of deposition notebook; preparation of trial notebook; review documents.	2.40
RHF Review file.	1.00
LC Draft abstract of deposition.	4.00
07/30/03 MWN Prepare for Trial; conference with Randy Freking.	1.30
LC Finalize jury instructions.	1.40
JT Prepare exhibit book.	4.30
AKC Conference with Mark Napier and Jennifer Trakas; review file	4.30
LC Draft abstract of deposition.	2.50
RHF Conference with Mark Napier.	0.50
JT Conference with Alicia Cole.	
MWN Conference with Alicia Cole.	0.10
07/31/03 MWN Review Juror Questions in part; note to Randy Freking.	0.40
MWN Conference with Cheryl and L. Newman.	1.50
MWN Prepare for trial; review materials; conference with Cheryl.	1.70

CHERYL SOUTHERLAND

Page: 18  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
AKC Conference with Alison Blinn, Jenna White and Kathi Huber; make copies; review documents; conference with Mark Napier.	0.80
RHF Prepare for trial.	1.50
AC Telephone conference with L. Newman; telephone conference with Cheryl; e-mail to L. Newman; conference with Cheryl and L. Newman; copy documents.	0.70
RHF Review Note - Mark Napier.	0.10
KJH Conference with Alicia Cole.	0.10
MWN Conference with Alicia Cole.	0.10
LC Telephone conference with Alicia Cole; conference with Cheryl and Mark	1.50
08/01/03 LC Conference with Randy Freking; preparation of jury instructions.	2.60
MWN Conference with Randy Freking.	1.00
MWN Telephone conference with L. Newman.	0.40
KJH Conference with Jennifer Trakas; conference with Mark Napier; telephone conference with Ace Reporters.	0.20
JT Conference with Kathi Huber regarding deposition transcripts; draft memo to Kathi Huber regarding same; revise deposition notebook.	1.00
AKC Conference with Mark Napier.	0.20
LC Revise deposition abstract.	1.50
RHF Conference with Mark Napier; review Motion for Summary Judgment; trial preparation.	3.50
MWN Conference with Alicia Cole	0.10
RHF Conference with law clerk	0.10
LC Telephone conference with Mark	0.40
08/02/03 MWN Prepare exhibits; trial preparation.	4.00
RHF Conference with Mark Napier; draft charts; review Memorandum in Opposition; trial preparation; conference with law clerk	3.80
MWN Conference with Randy Freking	0.30
LC Conference with Randy Freking	0.10
08/03/03 MWN Prepare for trial.	3.00
RHF Review Smith deposition; review Dr. Murthy deposition; review exhibits.	3.10
08/04/03 KJH Telephone conference with Ace Reporting.	0.10
JT Conference with Alicia Cole regarding medical expenses.	0.10
AKC Telephone conference with Mark Napier; conference with Jennifer Trakas and Randy Freking; review documents; preparation of copies; organize documents (trial exhibits); draft American Express List.	7.30
AC Prepare jury chart.	1.40
MWN Conference with Alicia Cole; review draft jury instructions; conference with law clerk.	1.30
LC Prepare jury instructions; conference with Mark Napier.	3.40
LC Research school district and punitive damages; conference with Mark Napier; research school district; preparation of jury instructions.	3.30

CHERYL SOUTHERLAND

Page: 19  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
LC Research school district.	1.00
RHF Organize exhibits; conference with Alicia Cole; review Cheryl's deposition.	2.80
JT Conference with Mark Napier regarding J. Potter.	0.10
MWN Conference with Jennifer Trakas	0.10
 08/05/03 SMS Review and revise jury instructions; conference with Randy Freking.	 0.40
SMS Review Defendant's Proposed jury instructions.	0.30
MWN Prepare for trial.	2.00
AC Prepare jury chart; preparation of trial charts; conference with Randy Freking; telephone conference with L. Newman; revise trial charts; conference with Beth Schirmer.	3.00
AKC Conference with Kathi Huber and Randy Freking; review documents; conference with Jennifer Trakas; organize documents (chart exhibits); draft letter; telephone call to I. Smith (left message); preparation of copies.	5.30
AC Prepare fax to L. Newman; conferences with Randy Freking; revise trial charts; telephone conference with L. Newman; e-mail to L. Newman.	0.70
LC Research - punitive damages.	1.10
LC Revise deposition abstract.	0.40
RHF Telephone conference with Lisa Newman; review Philips and Szak depositions; outline cross examination; review jury panel; preparation for jury selection.	4.20
KJH Conference with Randy Freking	0.10
JT Conference with Alicia Cole	0.10
RHF Conference with Sheila Smith; conference with Alicia Cole; conference with Angel Carpenter	0.40
LC Telephone conference with Angel Carpenter x2; Review fax and e-mail; telephone conference with Randy Freking	0.60
 08/06/03 JT Telephone conference with Cheryl regarding Janet Potter; telephone conference with J. Potter regarding trial preparation; telephone call to Mark Napier regarding J. Potter (left message).	 0.30
AKC Conference with Randy Freking; telephone conference with I. Smith; draft letter; conference with Jennifer Trakas; conference with Karen Pavy; review Pleadings.	1.40
AC Review e-mail from L. Newman; e-mail to Randy Freking.	0.20
SMS Conference with Jane Hughes; review research on punitive damages; conference with Randy Freking.	0.50
MWN Prepare for trial.	3.00
LC Research punitive damages.	6.00
RHF Prepare for trial; conference regarding depositions.	3.50
JT Conference with Alicia Cole	0.10
RHF Conference with Sheila Smith; conference with Alicia Cole; review e-mail Angel Carpenter	0.30
LC Attend trial	4.50
 08/07/03 MWN Attend trial, jury selection; conference with Cheryl; trial preparation; conference with J. Potter; conference with Randy Freking; conference with L. Newman.	 10.00

CHERYL SOUTHERLAND

Page: 20  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
LC Attend jury selection.	4.50
KJH Prepare chart; trial preparation.	0.50
LC Attend jury selection.	4.00
JT Telephone conference with B. Wharton regarding Murthy transcript.	0.20
AKC Prepare copies of exhibits; conference with Randy Freking; telephone conference with J. Spiegel's chambers; conference with Jenna White; conference with Mark Napier.	2.30
MEC Conference with Mark Napier and Randy Freking.	0.30
RHF Conference with Cheryl; conference with Mark Napier; conference with L. Newman; preparation regarding jury selection; conference with J. Sherman; conference with Mark Napier regarding trial preparation.	6.70
MWN Conference with Megan Clark	0.10
RHF Conference with Megan Clark; conference with Alicia Cole	0.20
LC Conference with Mark Napier; conference with Cheryl; Attend trial	5.00
08/08/03 MWN Conference with Alicia Cole; review e-mail from L. Newman; e-mail to Cheryl; review and revise proposed jury instructions; conference with law clerk; telephone conference with I. Smith; voice mail to Randy Freking.	1.40
KJH Prepare charts; trial preparation.	3.50
LC Conference with Randy Freking; final jury instructions; conferences with Mark Napier.	1.50
AKC Conference with Randy Freking, Kathi Huber and Mark Napier; preparation of documents; conference with Karen Pavy.	0.70
MWN Prepare for trial with Cheryl.	2.50
RHF Prepare for trial; conference with law clerk regarding jury instructions; finalize charts; conference with Kathi Huber; conference with Beth Schirmer; review Buchholz deposition.	7.50
KJH Conference with Randy Freking; conference with Alicia Cole	0.20
RHF Conference with Alicia Cole; review e-mail Mark Napier	0.20
08/09/03 MWN Prepare for trial with Cheryl; trial preparation.	6.00
RHF Conference with Mark Napier; trial preparation; conference with Cheryl; review charts; preparation for opening statement.	4.60
08/10/03 MWN Prepare for trial.	4.00
RHF Review notes; preparation for cross examinations; finalize; telephone conference with Mark Napier.	5.10
MWN Telephone conference with Randy Freking	0.10
08/11/03 AC Attend trial.	1.00
KJH Prepare for trial.	1.00
RES Prepare for trial.	1.00
AKC Conference with Mark Napier; review documents; preparation of copies; attend trial.	3.10
LC Attend trial; research Williams case.	6.40
MWN Conferences with Cheryl; attend trial; trial preparation.	10.50

CHERYL SOUTHERLAND

Page: 21  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
RHF Prepare for opening; preparation for cross examinations of Buchholz, Szak, and Phillips; attend trial - Day One; preparation for Day Two; conference with Cheryl; conference with Mark Napier.	14.30
MWN Conference with Alicia Cole; conference with Randy Freking	0.20
LC Attend trial; conference with Cheryl	4.50
08/12/03 AC Attend trial.	5.00
RES Prepare for trial.	2.50
LC Attend trial.	5.00
MWN Attend trial; trial preparation; preparation of jury instructions.	11.00
AKC Draft 2nd Amended Exhibit List; attend trial.	4.60
RHF Prepare for cross examination of Phillips; conferences with Cheryl; conferences with Mark Napier; attend trial Day Two; preparation for Day Three.	13.00
MWN Conference with Randy Freking	0.50
LC Attend trial	4.50
08/13/03 KJH Prepare charts; trial preparation.	0.30
MWN Attend trial; trial preparation; charge conference with Court.	8.30
LC Conference with Mark Napier; research; jury instructions hearing; conference with Mark Napier and Randy Freking.	4.60
AKC Conference with Mark Napier, conference with Sheila Smith; attend trial.	3.80
RHF Prepare for cross examination of Ekaco; attend trial - Day Three; conference with Mark Napier regarding jury charge; conference with J. Speigel; preparation for closing arguments.	14.50
MWN Conference with law clerk x2; conference with Alicia Cole	0.20
SMS Conference with Alicia Cole	0.10
RHF Conference with law clerk	0.10
LC Attend trial	4.50
08/14/03 KJH Prepare charts; trial preparation.	1.00
MWN Attend trial.	4.00
AKC Attend trial.	1.90
LC Attend closing arguments, trial.	3.00
RHF Prepare for closing arguments; conference with Mark Napier; attend trial; jury questions; verdict; conference with Cheryl and Denny regarding settlement; telephone conference with Smith; telephone conference with Wharton and Smith.	8.50
MWN Conference with Randy Freking	0.10
LC Attend trial	4.50
08/15/03 MWN Telephone conference with Cheryl; voice mail to Randy Freking.	0.20
RHF Prepare fee application.	1.20
RHF Review voice mail Mark	0.10

CHERYL SOUTHERLAND

Page: 22  
 September 12, 2003  
 Client Number 2036S  
 Statement No: 22591

LITIGATION - SYCAMORE COMMUNITY SCHOOL

	Hours
08/16/03 MWN Draft memo to Jennifer Trakas.	0.20
08/17/03 JT Review memo - Mark	0.10
08/19/03 MWN Review Judgment.	0.10
08/22/03 RHF Prepare fee application.	0.40
08/24/03 LC Review file	0.50
08/25/03 LC Review file; drafting of fee application	5.00
08/26/03 MWN Telephone conference with Cheryl.	0.10
MWN Review e-mail from Heather Waldron.	0.10
LC Conference with Randy Freking	0.20
RHF Conference with Heather Waldron	0.20
09/05/03 MWN Conference with Randy Freking; review fee application	0.50
RHF Review fee application; conference with Mark Napier	0.50
09/08/03 MWN Review and revise fee application; review file; drafting of Affidavit; conference with Heather Waldron	1.50
LC Conference with Mark Napier	0.20
09/10/03 MWN Review and revise fee application and Affidavit	0.70
09/12/03 MWN Finalize fee application	1.00
RHF Review fee application; conference with Heather Waldron	0.30
LC Conference with Randy Freking; conference with Mark Napier	0.40
For professional services	625.90
	114,998.50